

BEYS LISTON MOBARGHA & BERLAND LLP
Michael P. Beys

May 29, 2015

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: Kriss et al. v. Bayrock Group LLC et al., 10 Civ. 03959 (LGS);
Request for Two-Day Adjournment To File Brief

Dear Judge Schofield:

We are co-counsel to defendant Felix Sater in the above-captioned matter and respectfully submit this letter to request a two-day adjournment until Tuesday, June 2, 2015, to submit a brief in response to Respondent Oberlander and Lerner's Objections, dated May 14, 2015, to Magistrate Judge Maas's Order of April 30, 2015. Our brief is currently due today, as is co-defendant Bayrock's brief. The basis for the requested adjournment is to file our submission after we receive and review Bayrock's brief, to avoid duplicating or repeating any of the co-defendant's arguments.

I have spoken with Bayrock's counsel, Walter A. Saurack, Esq., and he consents to this application. I have also communicated with Simon Miller, Esq., counsel for Respondent Oberlander, and directly with Respondent Lerner. Both consent to the requested adjournment, provided they have an additional two days to file a reply, from the current due date of June 5, until Tuesday, June 9, 2015.

Accordingly, we ask the Court to extend both the date for defendant Sater to file a brief until June 2, 2015, and the date for Respondents to file their reply briefs until June 9, 2015.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Es
Counsel for Felix Sater

cc. Simon Miller, Esq. (via ECF)
Richard E. Lerner, Esq. (via ECF)